



**601 E. EDGAR AVE
RONCEVERTE, WV 24970
PHONE (304) 647-5913 FAX (304) 647-3778**

FAX TRANSMITTAL

Please deliver the following pages to:

Firm Name: DEP

Attention: Penny Harris

From: FELIX WEN SIMON

Date: 2/24/99

Total Number of Pages, Including Cover Sheet: 2

Regarding: NOV # : 10-992020-2P

Please notify us at (304) 647-5913 if this message is incomplete.

**Greenbrier New Jersey Office Address:
15 South Main Street, Suite 1; Edison, NJ 08837
Phone: (732) 321-8666 Fax: (732) 321-1885**

GREENBRIER
ARCHITECTURAL WOODWORK

February 23, 1999

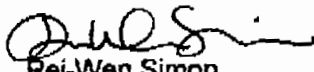
The Chief
Division of Environmental Protection
Office of Waste Management
1356 Hansford Street
Charleston, WV 25301

Dear Chief:

This letter documents our compliance on regulation 33 CSR 20 Section 5. As of today, we have posted our plant layout, indicating emergency exits as well as locations of fire extinguishers and spill control material next to a telephone to which employees have access when managing hazardous waste.

Please let me know with any questions.

Sincerely,


Pei-Wen Simon
Safety Coordinator

FC: Penny Harris, Environmental Inspector



COPY

GASTON CAPERTON
GOVERNOR

DIVISION OF ENVIRONMENTAL PROTECTION
1356 Hansford Street
Charleston, WV 25301-1401

DAVID C. CALLAGHAN
DIRECTOR

March 14, 1995

**CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

Jack Wykle, Shop Manager
Greenbrier Architectural W/W
P.O. Drawer 130
Ronceverte, West Virginia 24970

Dear Mr. Wykle:

Enclosed is a copy of the **Compliance Evaluation Inspection Report** completed by representatives of the Chief from the Office of Waste Management. This report is based on the inspection conducted on March 7, 1995.

Please refer to the **Notice of Violation** for those violations discovered during the course of this inspection. As a result of those violations, this report is being referred for the following action:

☒ **Notice of Violation (NOV)**
☐ **Civil and Administrative Penalty (CAP)**
☐ **Enforcement Referral**

A copy of this report is being transmitted to the United States Environmental Protection Agency (U.S. EPA), Region III, Philadelphia, Pennsylvania.

Thank you for your assistance and cooperation. If you have any questions concerning the inspection or the attached report, please feel free to contact Inspector J. R. Fredericks at **256-6850**.

Sincerely,

Thomas A. Fisher
Inspector Supervisor

TAF/kw

cc:

~~Waste Management, U.S. EPA, Region III~~
J. R. Fredericks, Inspector
Civil and Administrative Enforcement
File

Office of Waste Management, Compliance Monitoring and Enforcement
Telephone: (304) 558-5989 Fax: (304) 558-0256 TDD: 1-800-422-5700



DIVISION OF ENVIRONMENTAL PROTECTION

GASTON CAPERTON
GOVERNOR

Office of Waste Management

DAVID C. CALLAGHAN
DIRECTOR

SMALL QUANTITY GENERATOR-COMPLIANCE EVALUATION INSPECTION

The regulations for this inspection are the WV Hazardous Waste Management Act (Chapter 22-18), 47CSR35
Section 3.2.1.a, & 40CFR 260-265, which apply to facilities generating >100kg/month but <1000kg/month of Hazardous Waste (HW).

COMPANY NAME: Greenbrier Architectural W/W EPA ID#: WVD982703894
MAILING ADDRESS: P.O. Drawer 130 LOCATION: Airport Industrial Park
Ronceverte, WV 24970 COUNTY: Greenbrier PHONE: (304)497-3698
COMPANY CONTACT: Jack Wykle TITLE: Shop Manager ADV. OF AUTHORITY: (Y/N) Y
DATE INSPECTED: March 7, 1995 INSPECTORS: (1) John R. Fredericks DATE PREPARED: 3/8/95
TIME OF INSPECTION: 11:00 am (2) PREPARED BY: John R. Fredericks
VIOLATIONS: (Y/N) Y ACTION TAKEN: NOV FACILITY DESCRIPTION: Furniture manufacture
(NOV/CAP/Enf Ref/Other)
Hazardous Wastes (as Notified or updated) Qty/Mo. Disposal Co./Method
F005/D001 - Waste Paint Related Material - 400 #'s/month - Safety-Kleen

47CSR35 Section

YES NO N/A

3.2.1.a.B	Has facility made HW Determination for all waste?		X	
3.2.1.a.C	Has facility notified for all HW streams?			
3.2.1.a.D	All HW on-site <180 days (<270 days if TSDF >200miles & <6000kg HW on-site)?	X		
3.2.1.a.E (a)	All containers of HW in good condition?	X		
(b)	All containers of HW closed except when adding / removing waste?		X	
(c)	All containers of HW handled such that they will not rupture / leak?	X		
(d)	Are HW container storage areas inspected weekly and leaks/deterioration remediated upon detection?		X	
(e)	Incompatible wastes placed in separate containers?			X
(f)	Containers for incompatible HW separated by dike, wall, berm, etc.?			X
3.2.1.a.F	If facility accumulates HW in tanks, is facility complying with 40CFR §265.201?			X
3.2.1.a.G	If facility permanently closed a container/tank storage area, did facility comply with 40CFR §265.114?	X		
3.2.1.a.H (a)	All containers of HW clearly and visibly marked with accumulation start date?		X	
(b)	All containers / tanks of HW clearly labeled or marked "Hazardous Waste"?	X		
3.2.1.a.I (a)	Is waste reclaimed under contract specifying waste type and shipment frequency?	X		
(b)	Is transport vehicle owned and operated by the reclaimer?	X		
(c)	Copy of reclamation agreement kept on site for at least 3 years?	X		
3.2.1.a.J (a)	Copy of each properly completed manifest kept on site for at least 3 years if no reclamation agreement?		X	
(b)	Copies of any test results, waste analyses, etc. kept on site for at least 3 years?		X	
(d)	Copy sent to notify Chief if signed manifest not returned from TSDF in 60 days?	X		
3.2.1.a.K	Does operating manner minimize risk of fire / explosion / unplanned release?	X		
3.2.1.a.K (a)	Adequate alarm system, fire protection equipment & spill control equipment?	X		
(b)	Are the above tested and maintained to assure proper operation in emergency?	X		
(c)	When handling HW do all persons involved have immediate access to the above?	X		
(d)	Adequate aisle space for movement of personnel & emergency equipment?	X		
(e)	Arrangements with all appropriate local & state emergency response agencies?	X		
(f)	Documentation in operating record for any agency declining such arrangement?	X		
(g)	At least one designated emergency coordinator on site or on call at all times?		X	
(h)	All required emergency information posted next to a telephone?		X	
(i)	Do all employees know proper waste handling procedures & emergency procedures?		X	
(j)	Does emergency coordinator know proper responses which are his duty to initiate in an emergency?		X	
(k)	For release of HW affecting outside area, did facility properly report to National Response Center?			X

COMMENTS: FACILITY IS NOT COMPLYING WITH A NUMBER OF SQG REQUIREMENTS - SEE ABOVE. FACILITY SHOULD DO A HAZARDOUS WASTE DETERMINATION ON PAINT FILTERS.



DIVISION OF ENVIRONMENTAL PROTECTION
Office of Waste Management

GASTON CAPERTON
GOVERNOR

DAVID C. CALLAGH,
DIRECTOR

NOTICE OF VIOLATION

DATE: March 7, 1995

TIME: 11:00 am

ISSUED TO: Greenbrier Architectural Woodworking

EPA I.D.#: WV0000996165

NOV #: 95030701

FACILITY MAILING ADDRESS: P.O. Drawer 130 Ronceverte WV 24970

FACILITY REPRESENTATIVE: Jack Wykle, General Manager

On the date and time specified, an authorized agent of the Chief of the Office of Waste Management conducted an inspection of the facility described above in accordance with West Virginia Code, Chapter 22, Section 18 and/or an Order or Permit issued pursuant to §22-18. During that inspection the following violation(s) were noted:

1. A. (Regulation) 47 CSR 35-3.2.1.

B. (Facts) Non-compliance with several SQG requirements

2. A. _____

B. _____

3. A. _____

B. _____

In order to attain compliance with the cited Code and/or Regulations, you must perform the following remedial actions:

You must comply with the above-cited section(s) of the Regulations. It is recommended that you complete the following actions within 30 days of receipt of this Notice:

(1) Describe in writing the steps you have taken to comply with WV State Hazardous Waste Regulations for Small Quantity Generators at your facility. Document your compliance by writing to the Chief, Office of Waste Management, 1356 Hansford Street, Charleston, WV 25301 and send a photocopy or facsimile of that correspondence to this inspector.

A copy of this Notice of Violation will be forwarded to the Enforcement Unit of the Office of Waste Management. The issuance of this Notice may result in an administrative civil penalty being levied in accordance with West Virginia Code § 22-18-17.

District Phone: (304) 256-6850

Issued By: John R. Fredericks

District Fax: (304) 256-6948

Title: Environmental Inspector

CHARLESTON COPY

...ing the form. The information requested here is required by law (Section 3010 of the Resource Conservation and Recovery Act).



Notification of Regulated Waste Activity

Date Received (For Official Use)

United States Environmental Protection Agency

I. Installation's EPA ID Number (Mark "X" in the appropriate box)

☒

A. First Notification

☐

B. Subsequent Notification (complete item C)

OW 12/30/94

C. Installation's EPA ID Number

WV0000996165

II. Name of Installation (Include company and specific site name)

GREENBRIER ARCHITECTURAL W/W

III. Location of Installation (Physical address not P.O. Box or Route Number)

Street: Greenbrier

AIRPORT INDUSTRIAL PARK

Street (continued)

off of US 219 - HST 12/21/94

City or Town

State

ZIP Code

LEWISBURG

WV

24901-

County Code County Name

025 GREENBRIER

IV. Installation Mailing Address (See instructions)

Street or P.O. Box

P.O. BOX 130

City or Town

State

ZIP Code

RONCEVERTE

WV

24970-0130

V. Installation Contact (Person to be contacted regarding waste activities at site)

Name (last)

(first)

WYKLE

JACK

Job Title

Phone Number (area code and number)

PLANT MANAGER

304-497-3698

VI. Installation Contact Address (See instructions)

A. Contact Address Location Mailing

B. Street or P.O. Box

☒

AIRPORT INDUSTRIAL PARK

City or Town

State

ZIP Code

LEWISBURG

WV

24901-

VII. Ownership (See instructions)

A. Name of Installation's Legal Owner

LAROC CO ENT DBA GREENBRIER ARCHITECT

Street, P.O. Box, or Route Number

P.O. BOX 130

City or Town

State

ZIP Code

RONCEVERTE

WV

24970-0130

Phone Number (area code and number)

B. Land Type

C. Owner Type

D. Change of Owner Indicator

RECEIVED MONTH 12 DAY 21 1994

304-647-5913

☒

☒

Yes

No

GENERAL STATE SECTION

12-20 HST 5500

ID - For Office Use Only

VIII. Type of Regulated Waste Activity (Mark 'X' in the appropriate boxes. Refer to instructions.)

A. Hazardous Waste Activity

1. Generator (See instructions):
- ☐ a. Greater than 1000 kg/mo (2,200 lbs.)
- ☒ b. 100 to 1000 kg/mo (220 - 2,200 lbs.)
- ☐ c. Less than 100 kg/mo (220 lbs.)
2. Transporter (Indicate Mode in boxes 1-5 below):
- ☐ a. For own waste only
- ☐ b. For commercial purposes
- Mode of Transportation:
- ☐ 1. Air
- ☐ 2. Rail
- ☐ 3. Highway
- ☐ 4. Water
- ☐ 5. Other - specify _____
3. Treasor, Storer, Disposer (at installation):
- Note: A permit is required for this activity; see instructions.
- ☐ 4. Hazardous Waste Fuel
- ☐ a. Generator Manifesting to Burner
- ☐ b. Other Manifesters
- ☐ c. Burner - indicate device(s) - Type of Combustion Device
- ☐ 1. Utility Boiler
- ☐ 2. Industrial Boiler
- ☐ 3. Industrial Furnace
- ☐ 5. Underground Injection Control

B. Used Oil Fuel Activities

1. Off-Specification Used Oil Fuel:
- ☐ a. Generator Manifesting to Burn
- ☐ b. Other Manifester
- ☐ c. Burner - indicate device(s) - Type of Combustion Device:
- ☐ 1. Utility Boiler
- ☐ 2. Industrial Boiler
- ☐ 3. Industrial Furnace
2. Specification Used Oil Fuel Manifesting to On-site Burner Who First Claimed the Oil Meets the Specification

IX. Description of Regulated Wastes (Use additional sheets if necessary)

- A. Characteristics of Nonlisted Hazardous Wastes. Mark 'X' in the boxes corresponding to the characteristics of nonlisted hazardous wastes your installation handles. (See 40 CFR Parts 261.20 - 261.24)

1. Ignitable (D001) ☒ 2. Corrosive (D002) ☐ 3. Reactive (D003) ☐ 4. EP Toxic (D000) ☐ (List specific EPA hazardous waste number(s) for the EP Toxic contaminant(s))
- F0015 D001

... Listed Hazardous Wastes. (See 40 CFR 261.31 - 33. See instructions if you need to list more than 12 waste codes.)

1	2	3	4	5	6
7	8	9	10	11	12

C. Other Wastes. (State or other wastes requiring an I.D. number. See instructions.)

1	2	3	4	5	6

X. Certification

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment.

Signature

Name and Official Title (type or print)

VICE PRES / PLANT MNGR

Date Signed

11-30-94

XI. Comments

WE ARE OPENING A NEW MANUFACTURING LOCATION.

HST 12-20-94

RR 1-4-95

RECEIVED

Note: Mail completed form to the appropriate EPA Regional or State Office. (See Section III of the booklet for addresses.)

DEC 05 1994



**ACKNOWLEDGEMENT OF NOTIFICATION
OF REGULATED WASTE ACTIVITY
(VERIFICATION)**

This is to acknowledge that you have filed a Notification of Regulated Waste Activity for the installation located at the address shown in the box below to comply with Section 3010 of the Resource Conservation and Recovery Act (RCRA). Your EPA Identification Number for that installation appears in the box below. The EPA Identification Number must be included on all shipping manifests for transporting hazardous wastes; on all Annual Reports that generators of hazardous waste, and owners and operators of hazardous waste treatment, storage and disposal facilities must file with EPA; on all applications for a Federal Hazardous Waste Permit; and other hazardous waste management reports and documents required under Subtitle C of RCRA.

EPA I.D. NUMBER

+ WV0000996165

01/05/95

INSTALLATION ADDRESS

GREENBRIER ARCHITECTURAL W/W
PO BOX 130
RONCEVERTE, WV 249700130
JACK MYKLE PLANT MGR

GREENBRIER INDUSTRIAL PARK
LENISBURG, WV 24901